

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b> <b>WANDA PAULA BECHTEL</b> Debtor	: : : : : : : : : : :	<b>CHAPTER 13</b>  <b>CASE NO. 1:18-bk-00342</b>
<b>CITIZENS BANK, NA,</b> Movant	: : : : : : : : : : :	
v.	: : : : : : : : : : :	
<b>WANDA PAULA BECHTEL,</b> Respondent	: : : : : : : : : : :	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted; however, John E. Bechtel is deceased.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Proof of default is demanded at trial and this paragraph is therefore denied.
7. Proof of default is demanded at trial and this paragraph is therefore denied.
8. Denied that Movant has demonstrated cause for relief. Movant is protected by an equity cushion of approximately \$50,000.00.
9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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